



U.S. Department of  
Transportation

Office of the Secretary  
of Transportation

# Memorandum

Subject: **INFORMATION:** Position Sensitivity and Background  
Investigations for FPPS Security Points of Contacts (SPOCs) Date: **JAN 12 2004**

From: *Mari Barr Santangelo*  
Mari Barr Santangelo  
Deputy Assistant Secretary for Administration Reply to  
Attn. of

To: Human Resources Council

The Department is migrating to the Department of Interior, National Business Center's Federal Personnel and Payroll System (FPPS). As required by DOT Order 1630.2B dated May 30, 2001, all Access Control Officers (ACOs) for DOT systems that deal with sensitive employee data and/or payroll systems must have appropriate background investigations. Attached for your information is a memorandum addressed to the Human Resources Directors dated May 9, 2003, Position Sensitivity and Background Investigations for Access Control Officers, that emphasized this requirement.

Individuals who grant access to above systems are referred to as ACOs. An ACO is defined as an individual who has the authority to grant or limit access to users, including providing user identifications (IDs), passwords, and roles through an automated access control system of the personnel or payroll system. In contrast, the ACO function may be performed using a manual process that includes approving hardcopy access control forms for user IDs, passwords, and applicable roles and then sending those forms to a centralized location for input. Regardless whether the process is automated or manual, the same standards for position sensitivity level and background investigation apply.

The ACOs for FPPS are called Security Points of Contacts (SPOCs) and must have a Position Sensitivity Level 6 (high risk) background investigation. SPOCs are limited to granting access only for their Operating Administration (OA). Super SPOCs can grant access to anyone in the Department and also must have a Level 6 background investigation.

A Level 6 background investigation requires a full background investigation (BI) and costs approximately \$2505. Every five years, the BI must be updated by conducting a Periodic Reinvestigation (PRI) at a cost of \$435. The SPOC will be granted provisional access to the FPPS system after the background investigation has been initiated by filling out the correct background questionnaire and submitting them to Personnel Security Operations. Persons who have a current Secret or Top Secret Clearance can perform the duties of a SPOC or Super SPOC without being re-investigated.

Backup or Alternate SPOCs must have a Level 5 (Moderate Risk) background investigation at a cost of \$88.00. In addition, Personnel Security Operations will conduct a yearly credit check and criminal record review on all Level 5 SPOCs at no cost to the OA. FPPS will provide an audit trail that shows the actions performed by the Alternate SPOC, which must be reviewed weekly by the primary Level 6 SPOC to ensure no inappropriate actions are taken. Similar reviews are required for manual processes.

Human Resource Directors should ensure that individuals authorized to grant access have received the appropriate background investigation. If you have any questions or need additional guidance, please contact Kean Miller at (202) 366-0223.

Attachment



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# Memorandum

**INFORMATION:** Position Sensitivity and Background

Subject: Investigations for Access Control Officers (ACO)

Date: MAY - 9 2003

From:   
Mari Barr Santangelo  
Deputy Assistant Secretary for Administration

Reply to  
Attn. of:

To: Human Resources (HR) Directors

Consolidated Personnel Management Information System (CPMIS), Integrated Personnel and Payroll System (IPPS), and Data Repository Information System (DARIS) managers have the authority to grant system access to other individuals within their respective Operating Administrations. Recent audits have shown that these CPMIS, IPPS and DARIS managers do not have the appropriate position sensitivity level and background investigations required by DOT Order 1630.2B, May 30, 2001.

Individuals who grant access are referred to as Access Control Officers (ACO). An ACO may grant access, including the issuance of user identification (ID), passwords, and roles through a manual process or an automated access control system. For most of the ACO records reviewed, position sensitivity was Level 1 (low risk) and should have been Level 6 (high risk) for CPMIS/IPPS managers and Level 5 (moderate risk) for DARIS managers.

Human Resources Directors should ensure that individuals authorized to grant access have received the appropriate background investigation. There is a direct correlation between the sensitivity level and the type of investigation required.

- DOT employees or contractors that perform access control duties for CPMIS and IPPS must have position sensitivity Level 6 and must have, at a minimum, a full background investigation (BI) that costs approximately \$2,410. Every 5 years, the BI must be updated at a cost of \$1,370.
- DOT employees or contractors that perform access control duties for DARIS must have position sensitivity Level 5 and must have, at a minimum, a National Agency Check and Inquiry (NACI) background investigation that costs approximately \$85.

We are requesting that you review and reclassify, if necessary, personnel sensitivity position levels for individuals who grant user's access to CPMIS, IPPS and DARIS and ensure that appropriate background investigations are completed. If you have any questions, comments, or need additional guidance, please contact Kean Miller at (202) 366-0223.